March 27, 2003

Office of Special Nutritionals
Center for Food and Safety and Applied Nutrition
US Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Statements of Nutritional Support

Dear Sir or Madam:

Consider the following as notification of Statements of Nutritional Support as required under Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act as Amended (21 USC 343(r)(6)) and in accordance with 21 CFR 101.93.

Distributor:

Natreon, Inc.

14 A Jules Lane

New Brunswick, NJ 08901

Dietary ingredient: A specific extract of *Withania somnifera* as described in US Patent No. 6,153,198 and US Patent application docket number EWS-255/X.

Dietary supplement: A dietary supplement containing a specific extract of Withania somnifera as described in US Patent No. 6,153,198 and US Patent application docket number EWS-255/X.

Natreon, Inc. is a supplier of the raw material proprietary extract of Withania somnifera, to marketers/manufacturers of dietary supplements.

Text of substantiated statements:

STRESS

- Helps increase resistance to fatigue, stress, tension and irritability.
- Patented stress management extract.
- Helps to revitalize metabolic processes associated with stress, restlessness and fatigue.
- Helps inhibit stress-induced conditions.
- Helps the body cope with stress.
- Helps inhibit stress-inducing factors.
- Revitalizing formula promotes emotional well-being.
- Anti-stress formula promotes emotional well-being.

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- Helps balance physical and emotional stress.
- Helps the body cope with stress and build stamina.
- Helps the body adapt to physical and emotional stress.
- Promotes calming, relaxing state of mind.
- Helps inhibit the disabling effects of stress and anxiety.
- Enhances feeling of emotional well-being.
- Helps to reduce physical/emotional/mental fatigue and stress.
- Balances the body's response and inhibits stress levels.
- Helps to promote calming, relaxing state of mind and body.
- Helps promote a positive mood and mindset.
- Helps counteract the effects of stress.
- Helps promote positive mind and mood.
- Helps promote a peaceful state of mind.
- Helps alleviate the effects of stress and tension.
- Helps to balance stress levels and induce relaxation.
- Restorative extract regulates and balances body organs for increased physical and mental rejuvenation.

ANTIOXIDANT

- Helps prevent free radical initiated chemical reactions.
- Helps inhibit cellular oxidative stress.
- Promotes anti-oxidative defense foundation for the maintenance of healthy cellular function.
- Helps prevent cellular damage by promoting anti-oxidative environment.
- Helps slow the effects of aging by inhibiting oxidative damage to cells and tissues.
- Helps to protect cellular and tissue health.
- Helps to protect cellular membranes from alterations caused by free radicals.
- Helps retard the aging effects from pro-oxidative cellular damage.
- Supports the body's natural antioxidant defense system.
- Helps protect against the effects of aging by protecting against free radical damage to cells.

IMMUNE SUPPORT

- Helps support healthy immune function.
- Helps support cellular defenses.
- Helps support the body's immune defense.
- Helps enhance the body's own macrophage production.

ADAPTOGEN

- Helps to regulate and balance healthy metabolic function.
- Adaptogen enhances energy levels while helping to alleviate fatigue.

The information contained in this notice is complete and accurate. The distributor named above has substantiation that the statements are truthful and not misleading. If necessary, please address future correspondence to: Karen Weaver, Esq. Weaver & Amin, 150 N. Wacker Drive, Suite 2020, Chicago, IL 60606.

Vish Budharaju

President

Natreon, Inc.